

## **EXHIBIT 11**

### **Excerpts from Deposition Transcript of Christopher Faison**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CIVIL ACTION NO. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR  
ADMISSIONS, INC.,

Plaintiffs,

vs.

UNIVERSITY OF NORTH  
CAROLINA, et al.,

Defendants.

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DEPOSITION  
OF  
CHRISTOPHER FAISON

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TAKEN AT THE OFFICES OF:  
UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL  
222 East Cameron Avenue  
110 Bynum Hall  
Chapel Hill, NC 27514

03-03-17  
8:58 A.M.

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1 all students, whatever their -- wherever they come  
2 from, whatever their background are all treated  
3 equally?

4 A. No. That's not the definition of  
5 inclusive to me.

6 Q. Okay. Well, I guess, just so I  
7 understand, could you tell me a little bit --  
8 explain to me a little more clearly what you mean  
9 or maybe I just didn't get it. Could you try to  
10 explain again what you mean by the campus being  
11 inclusive?

12 A. So inclusive is with respect to the  
13 initial definition of diversity, taking difference  
14 and making certain -- or looking at -- for ways to  
15 make certain that people of difference are  
16 included and a part of all that university has to  
17 offer.

18 Q. Okay. So it's to make all students feel  
19 a part of the university?

20 A. Yes.

21 Q. Okay. What are the educational benefits  
22 of diversity?

23 A. So building on the last two definitions  
24 that I spoke to, the educational benefits of  
25 diversity based upon how I view or what I know is

1       that students not only interact with people that  
2       are different and they are included in different  
3       events on campus, but it also allows for students  
4       who are coming to our university from very many  
5       different backgrounds to have access to students  
6       with other backgrounds and it informs not just  
7       their academic understanding, but their social and  
8       emotional development, cross-cultural  
9       understandings and it just makes them a much more  
10      well-rounded future citizen.

11           Q.     Okay. How are these benefits realized  
12      here at the University of North Carolina at Chapel  
13      Hill?

14           A.     Can you define what realized means?

15           Q.     Sure. Like, you know, the University  
16      tries to achieve these benefits -- obtain these  
17      benefits -- realize these benefits ---

18           A.     Uh-huh (yes).

19           Q.     --- that you just mentioned.

20           A.     Uh-huh (yes).

21           Q.     What does the University -- what are  
22      some -- how does the University go about trying to  
23      achieve those benefits?

24           A.     I think the University goes about it in  
25      multiple ways. I think it often starts with what

1 the administration and faculty and staff look like  
2 for the student population. I think it also  
3 speaks to the ways in which we engage our alumni  
4 and also the local community and others that are  
5 affiliated with the University through all the  
6 various professional schools and institutes and  
7 centers that we have. And then all that basically  
8 provides, in my eyes, a nice preview for students  
9 to understand what the world will be like once  
10 they graduate.

11 Q. Okay. Has the University gotten better  
12 over time at achieving or realizing or obtaining  
13 these benefits for its student body?

14 A. In my opinion I think it has.

15 Q. What -- in what -- what do you feel that  
16 way?

17 A. I feel that way because as a former  
18 student I compare my experience to what I see now  
19 a -- as an administrator and I see lots of just  
20 difference across the board. I don't see things  
21 that's clearly defined with respect to the student  
22 population, especially just walking around campus.  
23 It's -- it's often, I think, sometimes difficult  
24 to walk into that room or at an event and  
25 understand who the event is for because students

1 have come to understand, based upon, I think, the  
2 ethos that the University has developed that you  
3 don't have to have a certain identity to  
4 participate in other events. And that is -- is  
5 laudable.

6 Q. Does the University do anything to  
7 measure the benefits that it obtains or achieves  
8 or realizes for diversity?

9 A. Yes. I believe through the diversity  
10 report or to the diversity report.

11 Q. Okay. Okay. I think we'll probably  
12 talk about that a little bit later.

13 A. Okay.

14 Q. Okay. Let me ask you a little bit about  
15 your office.

16 A. Okay.

17 Q. The Office of Men-of-Color Engagement.

18 A. Uh-huh (yes).

19 Q. So did you tell me that that office  
20 started in 2013?

21 A. When I started, yes.

22 Q. Okay. So that office was, you know,  
23 founded basically or initiated when you took the  
24 role?

25 A. Right.

1           Q.    Right?  And so that there's different  
2 aspects to diversity ---

3           A.    Uh-huh (yes).

4           Q.    --- depending on the different facets  
5 and ways in which people identify themselves.

6           A.    Right.

7           Q.    Right.  Okay.  So, how does that  
8 translate into benefits to the student body, of  
9 that diversity?

10          A.    So I think it translates in a few ways,  
11 and the first ways that I can think of are  
12 understanding cultural differences and  
13 appreciating various perspectives because of  
14 differences.  I think it promotes better work in  
15 groups or in teams.

16                   One of the best ways I've seen it  
17 improve or be of benefit to the student body is  
18 helping students think about things from various  
19 vantage points.  So when there's a problem, you'll  
20 have people ideally from very many backgrounds  
21 that can give solutions that would not come up if  
22 everyone weren't around the table.

23                   And our students do a really good job of  
24 interrogating processes that all of us have to be  
25 accountable to, and I appreciate that.  And I

1 think that would not be possible if we did not  
2 have lots of diverse pieces with respect to  
3 identities.

4 Q. Okay. And just so I understand, when  
5 you say "cultural differences," ---

6 A. Uh-huh (yes).

7 Q. --- is that meant to sweep in lots of  
8 different kinds of aspects of people's identity  
9 and character that varies ---

10 A. Yes.

11 Q. --- from one person to the next?

12 A. Yes.

13 Q. So it's religious?

14 A. Yes.

15 Q. It's socio-economic?

16 A. (Inaudible response)

17 Q. Yes?

18 A. Yes.

19 Q. Is it geographic?

20 A. It is.

21 Q. Okay. And would I be correct to presume  
22 it's geographic both for in-state students and  
23 out-of-state students?

24 A. Yes.

25 Q. Because a kid from Wilmington likely